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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, MARIELA
GONZÁLEZ, FREDDY JOSE ARAPE RIVAS,
M.H., CECILIA DANIELA GONZÁLEZ
HERRERA, ALBA CECILIA PURICA
HERNÁNDEZ, E.R., HENDRINA VIVAS
CASTILLO, A.C.A., SHERIKA BLANC, VILES
DORSAINVIL, and G.S.,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY, and UNITED STATES OF
AMERICA,

Defendants.

Case No. 3:25-cv-01766-EMC

**DECLARATION OF JOSE A. PALMA
JIMENEZ IN SUPPORT OF MOTION FOR
COMPLIANCE WITH COURT ORDER
[ECF 162]**

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1 I, José A. Palma Jimenez, declare:

2 1. I am Co-Coordinator of the National TPS Alliance (NTPSA). I have worked with the
3 NTPSA in various roles since it was founded in 2017. I served as Co-Coordinator in 2019 and again
4 from June 2023 through the present.

5 2. As Co-Coordinator, I oversee NTPSA's daily work, including its organizing and
6 advocacy efforts, leadership development, and member relations. I have detailed knowledge about
7 NTPSA's membership, including membership demographics, member needs and priorities, and the
8 role members play in setting NTPSA's mission and advocacy.

9 3. I make this declaration based on my personal knowledge; files and documents of
10 NTPSA that I have reviewed; and information provided to me by NTPSA leaders who I believe to be
11 reliable, including NTPSA organizers, members of the NTPSA Executive Committee, local
12 Committee Coordinators, and other NTPSA-affiliated staff. These files, documents and information
13 are the type that is generated in the ordinary course of business and that I would customarily rely on
14 in conducting NTPSA business.

15 4. Between June 10, 2025 and today, dozens of NTPSA members who hold TPS under
16 Venezuela's 2023 designation have reported to NTPSA that they have been fired from their jobs for
17 failing to maintain valid work authorization. This includes numerous members who report that they
18 applied to renew their employment authorization under the January 17, 2025 extension and received
19 notices of action acknowledging receipt and automatically extending their employment authorization
20 for up to 540 days on or before February 5, 2025.

21 I declare under penalty of perjury that the foregoing is true and correct, and that this
22 declaration was executed in Houston, Texas this 17th day of June, 2025.

23
24 /s/ José A. Palma Jimenez

25 José A. Palma Jimenez
26
27
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CIVIL LOCAL RULE 5.1 ATTESTATION

I hereby attest that I have on file all holographic signatures corresponding to any signatures indicated by a conformed signature (/S/) within this e-filed document.

NATIONAL DAY LABORER
ORGANIZING NETWORK

/s/ Jessica Karp Bansal
Jessica Karp Bansal